

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE COMPANY,
GEICO INDEMNITY COMPANY, GEICO GENERAL
INSURANCE COMPANY and GEICO CASUALTY
COMPANY,

Docket No.: 1:23-cv-09168
(DLI)(RML)

Plaintiffs,

-against-

PARK CHEMISTS 4 AV LLC, PARK CHEMISTS LLC,
MODERN REMEDIES LLC, GARY VALEVICH, IRINA
VALEVICH, ELISHA KOHANBASH, RACHEL
LEVIHAIEM, and JOHN DOE NOS. "1" through "10",

Defendants.
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STIPULATION TO EXTEND TIME TO ANSWER

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs,
Government Employees Insurance Company, GEICO Indemnity Company, GEICO General
Insurance Company and GEICO Casualty Company (collectively, "Plaintiffs" or "GEICO"), and
Defendants, Park Chemists 4 Av LLC, Park Chemists LLC, Gary Valevich, Irina Valevich,
Modern Remedies LLC, Elisha Kohanbash and Rachel Levihaem (collectively,
"Defendants"), that:

1. The time for Defendants to answer Plaintiffs' Complaint in the above-captioned action is extended to February 9, 2024;
2. The Defendants waive all defenses based on lack of personal jurisdiction or insufficiency of service of process;
3. Electronic or facsimile signatures will be deemed as originals for all purposes hereunder.

Dated: January 9, 2024
Uniondale, New York

RIVKIN RADLER LLP

By: 

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